

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DONALD C. HILLMAN and MICHAEL E.
MECSAS,

Plaintiffs

v.

SCHNADER HARRISON SEGAL & LEWIS,
LLP, *et al.*

Defendants

Civil Action No. 03cv12345 RGS

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1

Pursuant to Local Rule 16.1, plaintiffs ("Plaintiffs"), and Defendants (collectively, "Defendants") having conferred as required by Local Rule 16.1(B), hereby submit the following Local Rule 16.1(D) Joint Statement:

I. AGENDA FOR SCHEDULING CONFERENCE

The parties propose that the pre-trial schedule matters set forth in Section III below be discussed during the scheduling conference.

II. INITIAL DISCLOSURE - RULE 26(a)(1) and LOCAL RULE 26.2

The parties have agreed that they will exchange required automatic disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on or before February 26, 2004.

III. PROPOSED PRE-TRIAL SCHEDULE

A proposed pre-trial schedule, including a joint discovery plan and proposed schedule for the filing of motions, is as follows:

| EVENT | DATE |
|---|-------------------|
| Fact discovery completed by: | July 30, 2004 |
| Expert disclosures shall be made as required by Rule 26(a)(2) and Local Rules 16.5(C) and 26.4(A) by: | October 1, 2004 |
| Rebuttal expert disclosures shall be made by: | November 5, 2004 |
| Expert discovery to be completed by: | December 31, 2004 |
| All dispositive motions, including those pursuant to Fed. R. Civ. P. 56, filed by: | January 14, 2005 |

The parties will be prepared for a final pretrial conference at a date convenient for the Court. All dates set forth herein may be modified by written agreement of the parties and approval of the Court, or upon motion to the Court for good cause shown.

IV. MAGISTRATE JUDGE

The parties do not consent to trial by magistrate judge at this time.

V. SETTLEMENT

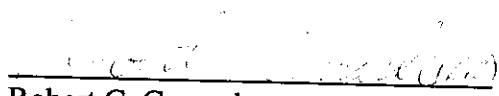
On November 17, 2003, defendants, through their counsel, made a verbal settlement proposal. Plaintiffs rejected that proposal, and on December 4, 2003, plaintiffs presented a written settlement proposal to defendants.

VI. LOCAL RULE 16.1(D)(3) CERTIFICATIONS

The parties Local Rule 16.1(D)(3) Certifications will be filed by the parties under separate cover.

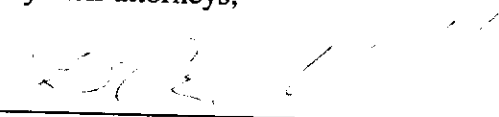
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Dated: February 19, 2004

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the
above document was served upon the
attorney of record for each other party
by mail-hand on 2/19/04
KAPAL